

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN DOE	:	CIVIL ACTION NO.
	:	No. 2:23-cv-00299-GAM
Plaintiff,	:	
v.	:	
HAVERFORD COLLEGE,	:	
COACH 1,	:	
CAPTAIN A, and	:	
STUDENT 1	:	
Defendants.	:	
	:	
	:	
	:	

DECLARATION OF JOSHUA W. B. RICHARDS, ESQ.

I, JOSHUA W. B. RICHARDS, declare as follows:

1. I am admitted to practice before this Court.
2. I am a partner at the law firm Saul Ewing LLP, counsel for Defendants Haverford College and Coach 1 (together the “Haverford Defendants”) in this proceeding.
3. I submit this declaration in support of the Haverford Defendants’ Motion to Dismiss and Memorandum of Law in Support thereof.
4. In support of the Haverford Defendants’ Motion to Dismiss and Memorandum of Law in Support thereof, I attach true and correct copies of the following exhibits:¹

¹The Haverford Defendants’ Motion to Dismiss also references the affidavits of Coach 1 (ECF No. 13-2) and Danielle Lynch (ECF No. 13-3) as well as the Feb. 3, 2023 TRO Hearing Transcript (ECF No. 23). In light of the fact that those documents are filed under seal, the Haverford Defendants have not reattached them to this filing, but can provide courtesy copies to the Court upon request.

- a. Exhibit A: Plaintiff's Feb. 4, 2022 Email; and
- b. Exhibit B: The Haverford College Student-Athlete Handbook.

I declare that the foregoing is true and correct.

Respectfully submitted,

Date: April 11, 2023

/s/Joshua W. B. Richards
Joshua W. B. Richards
SAUL EWING LLP
1500 Market Street, 38th Floor
Philadelphia, Pennsylvania 19102
(215) 972-7737
joshua.richards@saul.com

Counsel for the Haverford Defendants